

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANCELA,) Civil Action No. 8 Civ. 245
Plaintiff,)
v.)
BIRO MANUFACTURING COMPANY,)
Defendant.)

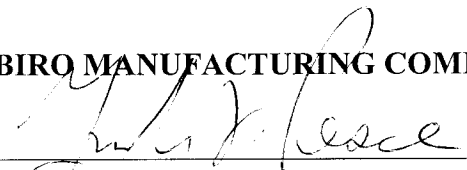
**BIRO MANUFACTURING COMPANY'S NOTICE OF MOTION
TO ADMIT PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed Affidavits of movants in support of this motion and the Certificates of Good Standing annexed thereto, we will move this Court on **September 4, 2008** for an Order allowing the admission of movants, Christopher J. Wesser and C. Stinson Lindenzweig, members of the firm of Moran Brown, PC and members in good standing of the Bar of the State of Virginia, as attorney pro hac vice to argue or try this case, in whole or in part, as counsel. There are no pending disciplinary proceedings against Christopher J. Wesser and C. Stinson Lindenzweig in any State or Federal court.

Dated: Garden City, New York
August 11, 2008

Respectfully submitted,

BIRO MANUFACTURING COMPANY



Frank V. Pesce, Esq. (FVP 7171)
FISCHETTI & PESCE, LLP
Attorneys for Defendant
310 Old Country Road - Suite 201
Garden City, New York 11530
516-873-1511
File No. 9020

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SOUTHERN DISTRICT OF NEW YORK
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Of Counsel:

Christopher J. Wesser (VSB No. 44648)
C. Stinson Lindenzweig (VSB No. 71214)
MORAN KIKER BROWN PC
4110 E. Parham Road
Richmond, Virginia 23228
Phone: (804) 421-6250
Attorneys for Defendant
The Biro Manufacturing Company

TO:

GORAYEB & ASSOCIATES, P.C.
Attorneys for Plaintiff
100 William Street - Suite 1205
New York, New York 10038

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANCELA,

Plaintiff,

v.

BIRO MANUFACTURING COMPANY

Defendant.

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MEMORANDUM

Civil Action No. 8 Civ. 245

The Biro Manufacturing Company ("Biro"), pursuant to 22 NYCRR § 520.11, moves the Court for an order admitting Christopher J. Wesser and C. Stinson Lindenzweig *pro hac vice*. This motion is supported by the memorandum below and affidavits of Christopher J. Wesser and C. Stinson Lindenzweig.

Memorandum

Christopher J. Wesser and C. Stinson Lindenzweig are attorneys with the law firm of Moran Brown PC, 4110 E. Parham Road, Richmond, Virginia 23228, telephone: 804-864-6250. Mr. Wesser and Ms. Lindenzweig are admitted to practice before the Supreme Court of Virginia and are in good standing with the bar in that state.

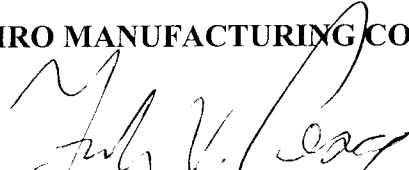
Mr. Wesser and Ms. Lindenzweig are counsel for Biro, and seek an order from this Court to be admitted *pro hac vice* to practice in New York and represent Biro in this matter. Frank V. Pesce, an attorney with Fischetti & Pesce, L.L.P., will at all times act as attorney of record in this matter.

Based on this, Biro respectfully requests that the Court GRANT its motion for admission *pro hac vice* to allow Christopher J. Wesser and C. Stinson Lindenzweig to practice before this Court in this case.

Dated: Garden City, New York
August 11, 2008

Yours, etc.,

BIRO MANUFACTURING COMPANY



Frank V. Pesce, Esq. (FVP 7171)
FISCHETTI & PESCE, LLP
Attorneys for Defendant
310 Old Country Road - Suite 201
Garden City, New York 11530
516-873-1511
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Of Counsel:

Christopher J. Wesser (VSB No. 44648)
C. Stinson Lindenzweig (VSB No. 71214)
MORAN KIKER BROWN PC
4110 E. Parham Road
Richmond, Virginia 23228
Phone: (804) 421-6250
Attorneys for Defendant
The Biro Manufacturing Company

TO:

GORAYEB & ASSOCIATES, P.C.
Attorneys for Plaintiff
100 William Street - Suite 1205
New York, New York 10038

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JULIANA MARIA MAYANCELA,)	
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Plaintiff,)	
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BIRO MANUFACTURING COMPANY)	
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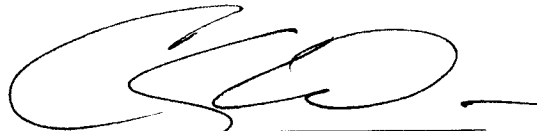
**AFFIDAVIT OF CHRISTOPHER J. WESSER IN SUPPORT OF
MOTION TO ADMIT COUNSEL PRO HAC VICE**

The undersigned, Christopher J. Wesser, being duly sworn, deposes and states as follows:

1. I am an attorney with the law firm of Moran Brown PC, 4110 East Parham Road, Richmond, Virginia 23228.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Virginia.
4. I am admitted to practice in the following courts: the Supreme Court of Virginia; the United States District Court for the Eastern District of Virginia and the United States Courts of Appeals for the DC, Fifth, Seventh, Tenth and Eleventh Circuits and the United States Courts of Appeals for the Seventh and Tenth Circuits.
5. There are no pending disciplinary proceedings against me in any State or Federal court, nor have there ever been.

6. I am familiar with and shall comply with the standards of conduct imposed upon members of the New York Bar and agree to abide by the rules of this Court, including all disciplinary rules.

7. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case.



CHRISTOPHER J. WESSER
VA State Bar No. 44648
Moran Brown PC
4110 East Parham Road
Richmond, Virginia 23228

Subscribed and sworn to under oath by Christopher J. Wesser this 2nd day of April, 2008, County of Henrico, Virginia.



Susan K Miller
Notary Public

My Commission Expires:

April 30, 2011

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,
do hereby certify that

CHRISTOPHER JAMES WESSER

was admitted to practice as an attorney and counsellor at the bar of this Court on
November 1, 1999.

I further certify that so far as the records of this office are
concerned, CHRISTOPHER JAMES WESSER is a member of the bar of
this Court in good standing.

Witness my hand and seal of said Court

This 4th day of August

A.D. 2008

By: 

Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANCELA,)	
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Plaintiff,)	
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v.)	Civil Action No. 8 Civ. 245
)	
BIRO MANUFACTURING COMPANY)	
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Defendant.)	

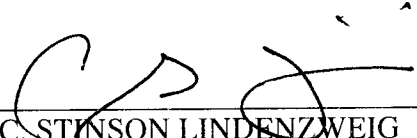
**AFFIDAVIT OF C. STINSON LINDENZWEIG IN SUPPORT OF
MOTION TO ADMIT COUNSEL PRO HAC VICE**

The undersigned, C. Stinson Lindenzweig, being duly sworn, deposes and states as follows:

1. I am an attorney with the law firm of Moran Brown PC, 4110 East Parham Road, Richmond, Virginia 23228.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Virginia.
4. I am admitted to practice in the following courts: the Supreme Court of Virginia and the United States District Court for the Eastern District of Virginia.
5. There are no pending disciplinary proceedings against me in any State or Federal court, nor have there ever been.

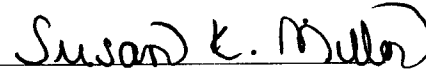
6. I am familiar with and shall comply with the standards of conduct imposed upon members of the New York Bar and agree to abide by the rules of this Court, including all disciplinary rules.

7. Wherefore your affiant respectfully submits that she be permitted to appear as counsel and advocate *pro hac vice* in this one case.


C. STINSON LINDENZWEIG
VA State Bar No. 71214
Moran Brown PC
4110 East Parham Road
Richmond, Virginia 23228

Subscribed and sworn to under oath by C. Stinson Lindenzweig this 14th day of April, 2008, County of Henrico, Virginia.




Notary Public

My Commission Expires:

April 30, 2011

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,
do hereby certify that

CANDACE STINSON LINDENZWEIG

was admitted to practice as an attorney and counsellor at the bar of this Court on
October 31, 2005.

I further certify that so far as the records of this office are
concerned, CANDACE STINSON LINDENZWEIG is a member of the bar
of this Court in good standing.

Witness my hand and seal of said Court

This 4th day of August

A.D/ 2008

By: 

Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
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Plaintiff,)	
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v.)	Civil Action No. 8 Civ. 245
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)	
Defendant.)	

ORDER FOR ADMISSION TO PRACTICE PRO HAC VICE

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorneys, Christopher J. Wesser and C. Stinson Lindenzweig, are permitted to argue or try this particular case in whole or in part as counsel or advocate.

This Order confirms your appearance as counsel in this case, and it will be entered on the court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorneys admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

ENTERED ON _____, 2008.

JUDGE

IN THE UNITED STATES DISTRICT COURT
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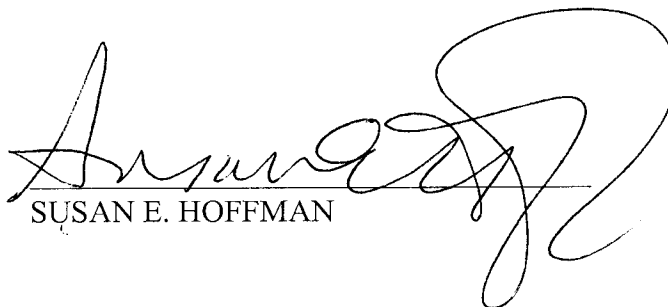
JULIANA MARIA MAYANCELA,)
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Plaintiff,)
)
v.)
)
BIRO MANUFACTURING COMPANY)
)
Defendant.)

Civil Action No. 08 CV 00245

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the DESIGNATION OF BIRO MANUFACTURING COMPANY'S NOTICE OF MOTION TO ADMIT PRO HAC VICE was mailed, postage prepaid, this 11th day of August, 2008 to:

GORAYEB & ASSOCIATES, P.C.
Attorneys for Plaintiff
100 William Street - Suite 1205
New York, New York 10038


SUSAN E. HOFFMAN
